

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA	:	
	:	Case No: 2:23-CR-188
v.	:	
	:	JUDGE SARAH MORRISON
	:	
STEPHEN CHINN,	:	

MOTION TO CONTINUE TRIAL

Now come the Defendant, Stephen Chinn, by and through undersigned counsel, and respectfully requests that the Court continue the trial date in this matter, currently scheduled for November 27, 2023, and extend all other dates and deadlines listed in the scheduling order.

Counsel for Defendant needs more time to investigate matters and is still in the process of reviewing discovery and other issues in this case. Counsel needs more time to prepared for trial or explore any other options in this matter. Mr. Chinn is aware of his rights under the Speedy Trial Act and has agreed to waive those rights for the purpose of the requested continuance. Counsel submits that the ends of justice served by granting the continuance outweigh the interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). Counsel for the Government, AUSA Emily Czerniejewski, is not opposed to this motion.

WHEREFORE, for the reasons set forth above, Counsel respectfully requests this Court grant this motion to continue.

Respectfully submitted,

/s/ Larry W. Thomas
LARRY W. THOMAS
Attorney for Defendant

/s/Douglas Funkhouser

DOUGLAS FUNKHOUSER

Attorney for Defendant

CERTIFICATE OF SERVICE

A true copy of the foregoing Motion for Continuance was electronically filed and served on all parties this 23th day of October, 2023

/s/Larry W. Thomas
Larry W. Thomas

/s/Douglas Funkhouser
Douglas Funkhouser